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Attorneys for Plaintiffs S.L. and CAROLYN CAMPBELL

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

S.L., a minor by and through the
Guardian Ad Litem Kristine Llamas
Leyva, individually and as successor-in-
interest to JOHNNY RAY LLAMAS,
deceased; V.L., by and through the
Guardian Ad Litem Amber Snetsinger,
individually and as successor-in-interest
to JOHNNY RAY LLAMAS, deceased;
and CAROLYN CAMPBELL,
individually,

Plaintiffs,

v.

COUNTY OF RIVERSIDE; SHAWN
HUBACHEK; JIMMIE MCGUIRE; and
DOES 3-10, inclusive,

Defendants.

Case No. 5:24-cv-00249-CAS-SP

Hon. Christina A. Snyder

**STIPULATION AND JOINT
REQUEST FOR ORDER
CONTINUING CERTAIN
PRETRIAL DEADLINES**

*[Proposed Order filed concurrently
herewith]*

1 **TO THE HONORABLE COURT:**

2 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs V.L., S.L.,
3 and Carolyn Campbell, and Defendants County of Riverside, Shawn Hubachek, and
4 Jimmie McGuire—the parties to this action—for the purpose of jointly requesting
5 that the honorable Court enter an order, pursuant to Fed. R. Civ. P. 16(b)(4) and any
6 applicable Orders of the Court, briefly continuing the applicable pretrial filing
7 deadlines, as follows:

8 **GOOD CAUSE STATEMENT**

- 9 1. This is a wrongful death and survival civil rights action involving the
10 Riverside County Sheriff's Department.
- 11 2. The Court issued an Order setting pretrial dates and deadlines in this action on
12 June 3, 2024, including a deadline to file Motions *in Limine*. [Dkt. 27.] This
13 Court's Local Rules impose additional pretrial filing deadlines, including
14 deadlines to file Memoranda of Contentions of Fact and Law; Witness Lists; a
15 Joint Exhibit list; and a deadline to file a Proposed Final Pretrial Order,
16 including objections to exhibits. [L.R. 16-4, 16-5, 16-6.1, 16-6.3, 16-7.]
- 17 3. The foregoing deadlines were subsequently continued once by order of this
18 Court, at the parties' request, to allow the parties to attempt to resolve this
19 action at a September 10, 2025, mediation prior to trial, without the parties
20 first having to prepare and submit the above-mentioned pretrial documents to
21 the Court. As a result of the Court's order, the current deadlines for these
22 documents are as follows [Dkt. 62]:
- 23 a. Deadline to File Motions *in Limine*: September 12, 2025
- 24 b. Deadline to File Memoranda of Contentions of Fact and Law, Witness
25 List, and Joint Exhibit List: September 12, 2025
- 26 c. Deadline to File Proposed Final Pretrial Order (with Objections to
27 Exhibits): September 15, 2025
- 28

- 1 4. In the same order, this Court also imposed a Deadline to File Oppositions to
2 Motions *in Limine* of September 19, 2025.
- 3 5. The parties participated in a mediation with the Court's assigned panel
4 mediator for this case, Richard T. Copeland, on September 10, 2025, during
5 which the action did not settle.
- 6 6. On July 18, 2025, following this Court's order denying in part and granting in
7 part Defendants' motion for summary judgment [Dkt. 54], Defendants filed a
8 notice of intent to appeal the summary judgment order. [Dkt. 55.]
- 9 7. On August 14, 2025, Defendants moved to stay this action in this Court
10 pending their appeal. [Dkt. 63.] Defendants' motion is now fully briefed and
11 is set for a hearing on Monday, September 15, 2025, at 10:00 a.m. [*Id.*; Dkt.
12 64-65.]
- 13 8. Following initial meet-and-confer efforts regarding the parties' anticipated
14 motions *in limine*, counsel have continued these efforts in an attempt to
15 stipulate to as many aspects of the anticipated motions as possible, and
16 thereby streamline the pretrial issues to be litigated. However, counsel have
17 learned that Defendants' counsel will be unavailable on Thursday, September
18 11, and Plaintiffs' counsel will be unavailable on Friday, September 12, the
19 current deadline to file motions *in limine*.
- 20 9. In light of the foregoing, counsel for the Parties would substantially benefit
21 from, and through this stipulation respectfully request, five (5) additional
22 calendar days to file the Parties' motions *in limine*, any associated
23 stipulation(s), and oppositions to the motions *in limine*. Given the proximity
24 in the upcoming deadlines and the hearing on the pending motion to stay
25 scheduled for the morning of Monday, September 15, counsel also
26 respectfully request the same modest continuance of the current deadlines to
27 file Memoranda of Contentions of Fact and Law, Witness Lists, Joint Exhibit
28 List, and Proposed Final Pretrial Order.

1 10.A Pretrial Conference is currently scheduled for September 29, 2025, at 11:00
2 a.m. [Dkt. 62], and a Jury Trial is currently scheduled to begin in this action
3 on October 7, 2025. [Dkt. 27.] Through this stipulation, the Parties are not
4 requesting any continuance of these dates.

5 11.This is the second request by the parties for a continuance of any dates or
6 deadlines in this matter.

7 **STIPULATION RE: CONTINUANCE OF CERTAIN PRETRIAL FILING**
8 **DEADLINES**

9 12.Accordingly, in light of the foregoing Good Cause, the Parties hereby
10 stipulate and request an order continuing the above-mentioned filing
11 deadlines as follows:

EVENT	CURRENT DEADLINE	REQUESTED DEADLINE
Deadline to File Motions <i>in Limine</i>	09/12/2025	09/17/2025
Deadline to File Memoranda of Contentions of Fact and Law, Witness List, Joint Exhibit List	09/12/2025	09/17/2025
Deadline to File Proposed Final Pretrial Order (with Objections to Exhibits)	09/15/2025	09/22/2025
Deadline to File Oppositions to Motions <i>in Limine</i>	09/19/2025	09/24/2025

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24 13.The parties are not currently requesting a continuance of any other dates or
25 deadlines set by the Court in this case and the parties understand that all other
26 dates and deadlines, including the trial date, shall remain unchanged and
27 unaffected by the parties' stipulation and by the Order requested by the
28 parties.

1 **IT IS SO STIPULATED.**

2
3 DATED: September 10, 2025

LAW OFFICES OF DALE K. GALIPO

4
5 By: /s/ Benjamin S. Levine
6 Dale K. Galipo
7 Benjamin S. Levine¹
8 *Attorneys for Plaintiff V.L.*

9 DATED: September 10, 2025

MARDIROSSIAN AKARAGIAN, LLP

10
11 By: /s/ Lawrence D. Marks
12 Garo Mardirossian
13 Lawrence D. Marks
14 *Attorneys for Plaintiffs S.L. and Carolyn Campbell*

15 DATED: September 10, 2025

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

16
17
18 By: /s/ Kayleigh Andersen
19 Eugene P. Ramirez
20 Lynn L. Carpenter
21 Kayleigh Andersen
22 *Attorneys for Defendants*
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27 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all
28 other signatories listed, and on whose behalf the filing is submitted, concur in the
filing's content and have authorized the filing.